



## **Equal Employment Opportunity Program**

### **Affirmative Action Plan July 2011- June 2016**

**Office of Civil Rights  
Affirmative Action Program  
Aliiimoku Building  
869 Punchbowl Street  
Honolulu, HI 96813  
(808) 587-2135 or (808) 587-5339**

**Glenn Okimoto, Director**

**Rey Domingo, Civil Rights Manager**

**Clifton Harty, EEO/AA Specialist**

**APPROVAL SECTION**

Program Plan Completed by:


  
\_\_\_\_\_  
Clifton Harty  
EEO/AA Specialist

9/30/2011  
Date

Concurred and Approved by:

  
\_\_\_\_\_  
Rey Domingo  
Civil Rights Manager

9/30/11  
Date

  
\_\_\_\_\_  
Glenn Okimoto  
Director

OCT 04 2011  
Date

## TABLE OF CONTENTS

AFFIRMATIVE ACTION PLAN INTRODUCTION.....	5
<i>What is an Equal Employment Opportunity Program?</i> .....	5
What is an Affirmative Action Plan?.....	5
Why must HDOT have an Affirmative Action Plan?.....	5
Which Federal Agencies Provide Funding to HDOT? .....	6
Brief History of HDOT:.....	6
Hawaii’s Unique Population: .....	7
HDOT Locations Covered by this Plan: .....	7
Products and Services Provided by HDOT:.....	7
Current and Anticipated Economic Picture for HDOT.....	8
Hiring Procedures at HDOT .....	9
Statement on Implementation of the Affirmative Action Plan .....	12
Non-Discrimination and Anti-Harassment Policy Statement .....	13
Sexual Harassment Policy Statement.....	14
RESPONSIBILITIES FOR IMPLEMENTING THE AFFIRMATIVE ACTION PLAN	15
Director of Transportation .....	15
Civil Rights Manager .....	15
Equal Employment & Affirmative Action Specialist .....	15
Managers and Supervisors .....	16
Department Employees .....	17
A SURVEY OF THE LABOR MARKET AREA IN TERMS OF POPULATION MAKEUP, SKILLS, AND, AVAILABILITY FOR EMPLOYMENT .....	18
Agency Workforce.....	18
Plan Methodology .....	18
UTILIZATION ANALYSIS .....	19
Job Categories .....	19
Eight Factor Analysis.....	20
EEO-4/EEO-4A Factors.....	20
Job Group Narrative.....	21
COMPLAINT PROCEDURES .....	25
Department of Transportation Internal Complaints .....	25
Hawaii Civil Rights Commission (HCRC).....	28
Equal Employment Opportunity Commission (EEOC).....	28

PUBLICATION OF AFFIRMATIVE ACTION PLAN .....	29
Internal Publication:.....	29
External Publication:.....	29
<b>HDOT PROGRAMS TO ELIMINATE DISCRIMINATORY BARRIERS AND ACHIEVE HDOT GOALS.....</b>	<b>31</b>
Job Structuring and Upward Mobility: .....	31
Recruitment, Placement, Hiring:.....	31
Promotions:.....	32
Training:.....	32
Layoffs, Recalls, Discharges, Demotions, Disciplinary Actions:.....	33
Additional Personnel Actions: .....	34
<b>MAINTAINING CONTACTS WITH ORGANIZATIONS REPRESENTING MINORITY GROUPS, FEMALE AND PROFESSIONAL SOCIETIES.....</b>	<b>35</b>
Community Action Programs .....	35
Minority and Female Recruiting Sources .....	36
<b>APPLICATIONS OF FOUR-FIFTHS RULE .....</b>	<b>37</b>
<b>PROGRAM COMMITMENTS AND GOALS.....</b>	<b>38</b>
<b>APPENDIX.....</b>	<b>41</b>
<b>JOB GROUPS.....</b>	<b>42</b>
Officials.....	42
Professionals .....	48
Technicians .....	76
Protective Services.....	87
Para-Professionals.....	94
Administrative Support.....	95
Skilled Crafts Workers.....	113
Service and Maintenance Workers .....	126
<b>FORMS .....</b>	<b>146</b>
Selection Review Form.....	146
Employee Self-Identification Form .....	147
EEO/AA Checklist for Selection Recommendations .....	148
Employment Data Spreadsheets .....	149

## **AFFIRMATIVE ACTION PLAN INTRODUCTION**

### ***What is an Equal Employment Opportunity Program?***

An Equal Employment Opportunity (EEO) Program sets forth results-oriented policies and commitments of good faith efforts to attain fairness and equity in the administration of all Hawaii Department of Transportation (HDOT) employment practices such as recruitment, hiring, pay, benefits, job assignments, leave, promotions and all other employment actions. The program promotes the creation of a diverse workforce, and an inclusive, open work environment free of discrimination or harassment based on race, color, sex, gender, national origin, ancestry, age, religion, disability, marital status, veteran's status, pregnancy, women breast feeding, sexual preference, gender identification, victims of sexual or domestic abuse, arrest or court records, national guard participation, and genetic information.

### **What is an Affirmative Action Plan?**

An Affirmative Action Plan (AAP) is an integral part of an EEO Program. It details positive steps to overcome the effects of past or present barriers to assure that the HDOT workforce is reflective of the available labor pools of the communities served. The purpose of the AAP is the development, implementation, monitoring, and evaluation of EEO in HDOT's programs. Through the AAP, the HDOT reports its progress and accomplishments to its employees, the public, and the appropriate federal agencies.

### **Why must HDOT have an Affirmative Action Plan?**

The HDOT is required by federal rules and regulations to provide Affirmative Action and Equal Employment Opportunity to its employees. The receipt and acceptance of federal funds requires the HDOT to abide by the regulations and rules of federal agencies that have awarded the funds to HDOT. The following are regulations and rules promulgated by federal agencies requiring an AAP:

*U.S. Department of Transportation (USDOT):*

The USDOT requires that all recipients of USDOT funds "take affirmative action to insure that applicants are employed, and employees are treated during employment, without regard to their race, color, or national origin."

49 CFR 21.5(c)(1-3). The term recipient includes States and Territories.  
49 CFR 21, App. A(f).

*Federal Transit Administration (FTA):*

The FTA AAP requirements are in UMTA Circular 34704.1. (UMTA stands for Urban Mass Transit Administration, which is now known as the Federal Transit Administration). In addition, the master agreement between the FTA and recipient HDOT states “Even if a single organization within a legal entity is designated the Recipient in the Grant Agreement or Cooperative Agreement, the entire legal entity is the Recipient.” (Section 1(n)). The master agreement also states that the recipient agrees to “take affirmative action to ensure that applicants are employed and that employees are treated during employment without regard to their race, color, religion, sex, disability, age or national origin.” (Section 12(c)(1)).

*Federal Highways Administration (FHWA):*

The FHWA AAP requirements are in 23 CFR § 230, Subpart C, Appendix A, Part II.

## **Which Federal Agencies Provide Funding to HDOT?**

*U.S. Department of Transportation:*

- Federal Highways Administration
- Federal Aviation Administration
- Federal Transit Administration
- Maritime Administration

*U.S. Department of Homeland Security*

- Federal Emergency Management Agency
- Transportation Security Administration

## **Brief History of HDOT:**

The HDOT was formed shortly after Hawaii became a state in 1959. The HDOT has three modal divisions (Airports, Harbors, and Highways) and a Support Services or Administration Division. The four divisions are headed by their respective Deputy Director. There are nine offices in the Administrative Division: Community Affairs Office; Office of Civil Rights; Office of Special Compliance; Statewide Transportation Planning Office; Personnel Office; Business Management Office; Computer Systems and Services Office; Contracts Office; and Program, Planning and Budget Office.

## **Hawaii's Unique Population:**

The State of Hawaii is unique among the fifty states as there is no clear majority. The diverse makeup of Hawaii's population adds different dimensions to HDOT's AAP. The diversity also presents its own advantages and disadvantages when attempting to implement the AAP. In Hawaii, the minority population far exceeds the White population, which has resulted in the reclassification and expansion of the racial categories for Hawaii by the Federal government.

The Equal Employment Opportunity Commission, for example, reclassified and added racial categories on the EEO form for Hawaii. The new form, EEO-4A, is unique to Hawaii. The previous racial categories included White, Black, Hispanic, Asian, and American Indian. The Additional categories are: Hawaiian/Part Hawaiian, Chinese/Korean, Japanese, and Filipino.

## **HDOT Locations Covered by this Plan:**

The HDOT is located at 869 Punchbowl Street in Honolulu with additional offices and facilities on the islands of Oahu, Kauai, Maui, and Hawaii.

## **Products and Services Provided by HDOT:**

The HDOT is responsible for planning, designing, constructing, operating, and maintaining State facilities and infrastructures in all modes of transportation (land, air, and water). To achieve these objectives, the HDOT coordinates with other State, County, Federal, and private agencies. The HDOT's mission is to provide a safe, efficient, accessible, and inter-modal transportation system that ensures the mobility of people and goods, and enhances and/or preserves economic prosperity and the quality of life. The HDOT currently provides, operates, and maintains eleven (11) commercial service airports; four (4) general aviation airports; nine (9) commercial harbors; and two thousand four hundred fifty (2,450) lane miles of highway. Four of the five major airports now serve domestic and overseas carriers. The HDOT has transportation facilities and infrastructure on all of the six major islands.

The HDOT is composed of four principle sub-programs: Air Transportation Facilities and Services; Water Transportation Facilities and Services; Land Transportation Facilities and Services; and Overall Program Support for Transportation Facilities and Services. These four sub-programs represent approximately thirty-five (35) separate lower-level programs and plans that HDOT must manage and budget.

There have been significant changes in personnel and the organization in HDOT since the last AAP in 2002. The Office of Civil Rights was created and the position of Equal Employment Opportunity Specialist was established. Previously, affirmative action procedures and reporting were handled by the HDOT's Personnel Office. Now, the program is overseen by the Office of Civil Rights under the direction of the Civil Rights Manager.

## **Current and Anticipated Economic Picture for HDOT**

The HDOT is required by law to generate its own monies to fund its programs and projects. Independent special funds were established for each of the three (airports, harbors, and highways) Division's major programs. Each fund is expected to generate enough revenue to pay for the programs' operation and maintenance costs and to contribute a fee to the State General Fund for central services. This fee is set at five percent of each special fund's gross revenues after debt service.

The nationwide economic decline has impacted HDOT, resulting in program budget constraints, hiring freezes, and wage and benefit reductions

HDOT special funds must also provide a higher level of cash financing in the Capital Improvement Program (CIP) to ease the burden on debt service. Since the CIP is large, the HDOT continues to rely on reimbursable General Obligation Bonds and federal aid (largely through the USDOT) to help fund its programs and projects.

*The Airport Revenue Fund* was created under Section 248-8, Hawaii Revised Statutes. Its primary revenue sources are the aviation fuel tax, landing fees, airport use charges, concession fees, and investment income. Other revenue sources include rentals and miscellaneous earnings.

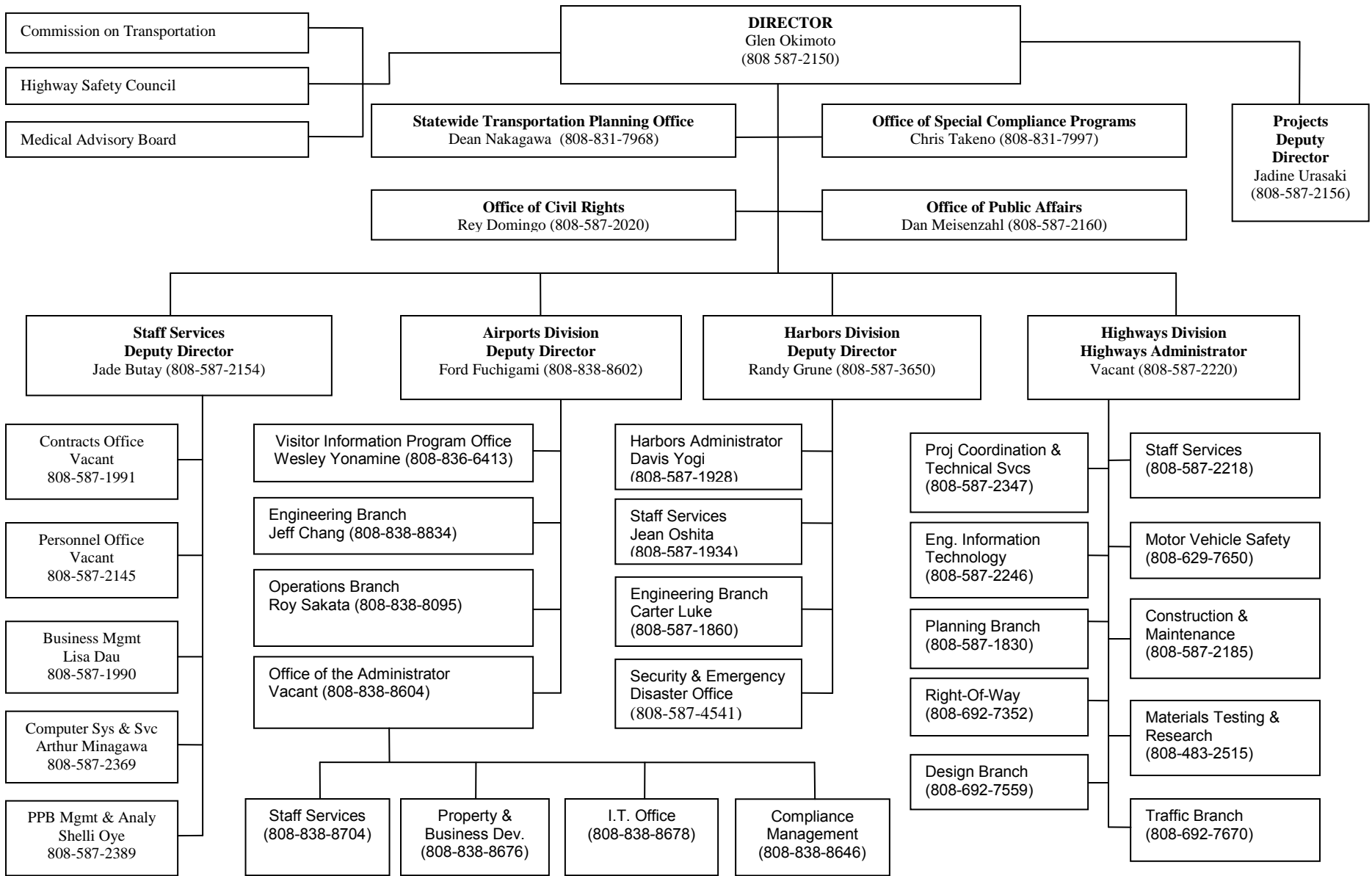
*The Harbor Special Fund* was established under Section 266-19, Hawaii Revised Statutes. The majority of the fund's revenues comes from fees and charges for profiles, dockage, demurrage, and the rental of land and wharf space at the state's commercial harbors. The remaining amount is generated from various service charges, permits, and licenses.

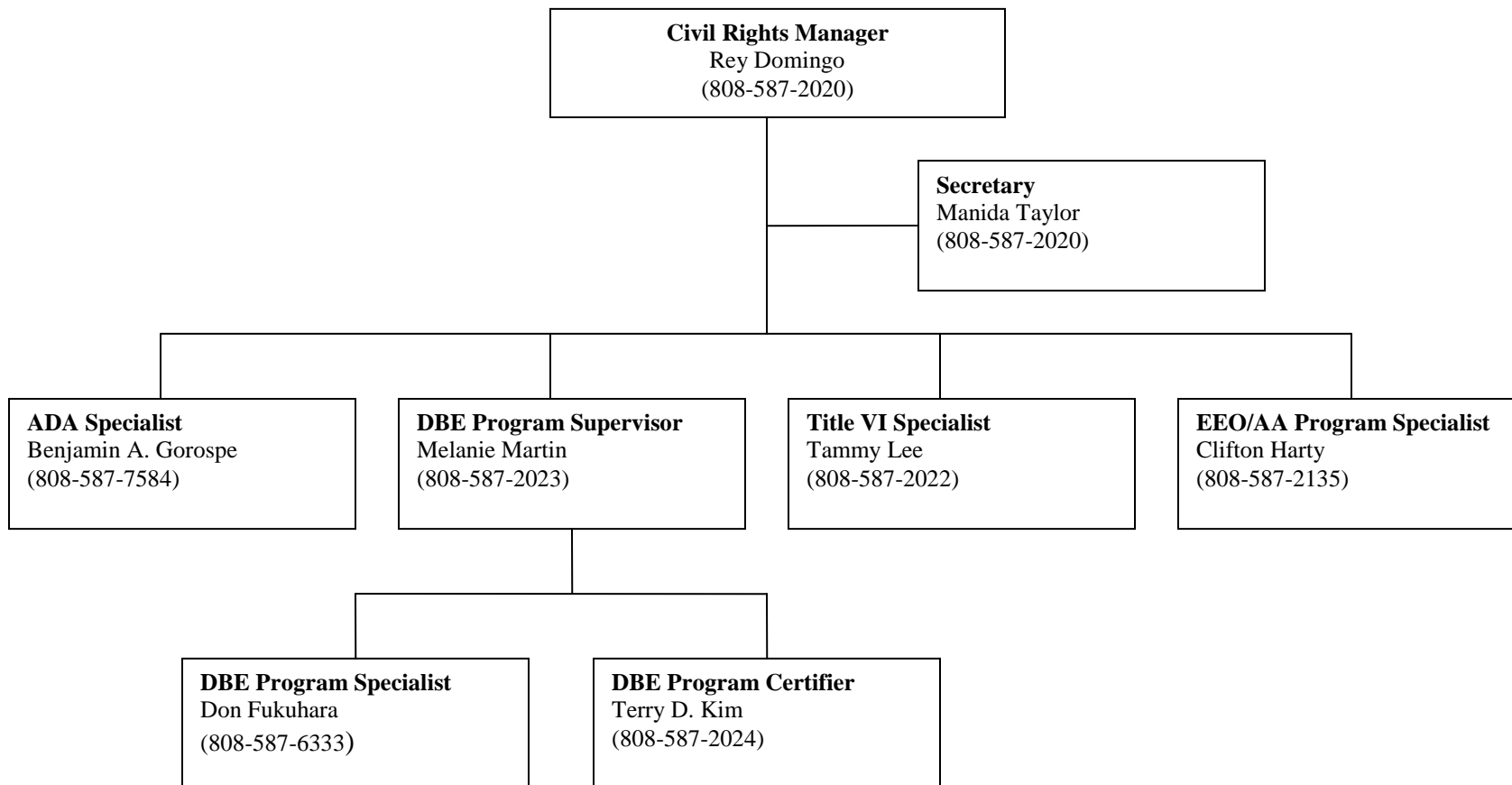
*The State Highway Fund* was established under Section 248-8, Hawaii Revised Statutes. The principal sources of revenue are taxes or fees relating to liquid fuel, vehicle registration, motor vehicle weight, rental motor vehicle surcharge, tour vehicle surcharge, and periodic motor vehicle inspections (safety).



## **Hiring Procedures at HDOT**

Vacancies are mostly filled through the Department of Human Resource Development's on-line application system and HDOT's internal vacancy recruitment process. Some unskilled positions are directly hired by the HDOT.





## STATEMENT ON EQUAL EMPLOYMENT OPPORTUNITY

As the Director of the Hawaii Department of Transportation (HDOT) I am committed to the principles and spirit of Equal Employment Opportunity (EEO) for all employees and employment applicants.

It is a fundamental policy of HDOT to ensure equal opportunity in employment to every individual regardless of race, color, sex, gender, national origin, ancestry, age, religion, disability, marital status, veteran's status, pregnancy, women breast feeding, sexual preference, gender identification, victims of sexual or domestic abuse, arrest or court records, national guard participation, and genetic information. Equal Opportunity and Affirmative Action Programs are legal, social, and economic requirements that provide for the success of HDOT as a whole. I will continue to closely monitor and evaluate these programs.

The Office of Civil Rights (OCR) has prepared a new Affirmative Action Plan (AAP) that will apply to all divisions within HDOT. The AAP will encompass all human resources programs including, but not limited to, recruitments, hirings, transfers, promotions, trainings, compensation and benefits, recognitions, terminations, layoffs, and all other terms and conditions of employment. EEO is an important and fundamental necessity to ensure that all employees are treated fairly and equally. A firm commitment to implementation of the AAP's goals and timetables will help HDOT to overcome the effects of past discrimination and ensure equality for minorities and women.

In order for the AAP to be successful it will need the support, involvement, and commitment of executives/managers, supervisors and employees. Every executive/manager, supervisor, and employee shall be held responsible for positive implementation of the AAP. All managers, supervisors, and employees are advised that you shall be held accountable for your actions or inactions regarding Equal Employment Opportunity and Affirmative Action and you will be evaluated in carrying out the measurable goals and responsibilities of the AAP.

The primary goal of the AAP is to remove any barriers toward EEO. The AAP identifies problem areas and sets goals to ensure that persons are not unfairly excluded or held back and enables individuals to compete for jobs on an equal and fair basis.

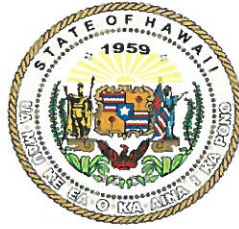
I want to reaffirm my commitment to nondiscrimination in HDOT and that all applicants and employees have the right to be treated equally and fairly and to file complaints alleging discrimination with OCR, the Equal Employment Opportunity Commission, and the Hawaii Civil Rights Commission.

Sincerely,



---

Glenn Okimoto  
Director of Transportation



STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
869 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

IN REPLY REFER TO:  
OCR 1.7253

**NON-DISCRIMINATION and ANTI-HARASSMENT POLICY STATEMENT  
(addendum to the Civil Rights Policy)**

The purpose of this addendum is to reiterate the Hawaii State Department of Transportation's policy against illegal discrimination and harassment, and commitment to maintaining a work environment free from these activities.

It is our policy not to unlawfully discriminate in employment due to an individual's protected basis: race, color, sex, gender, national origin, ancestry, age, religion, disability, marital status, veteran's status, pregnancy, women breast feeding, sexual preference, gender identification, victims of sexual or domestic abuse, arrest or court records, national guard participation, genetic information, and any other protected characteristic under the law. HDOT will ensure that it is in compliance with Chapters 368 and 378 of the Hawaii Revised Statutes and Title VII of the U.S. Civil Rights Act of 1964.

Specifically, it is an unlawful discriminatory practice to refuse to hire or employ or to bar or discharge from employment, or otherwise to discriminate against any individual in the terms, conditions, or privileges of employment because of their protected basis.

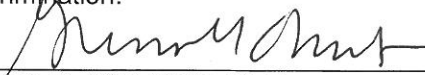
An incident of harassment or other alleged illegal discrimination by an employee or non-employee should be brought immediately to the attention of the department's Equal Employment Opportunity / Affirmative Action Officer who will thoroughly investigate and take appropriate corrective action to prevent further occurrence. Disciplinary action up to and including discharge will be taken against any employee who is found to have engaged in harassment or other alleged discrimination.

Harassment includes many forms of offensive behavior. The following is a partial list:

1. Verbal harassment, such as racial, ancestry (or any other protected basis) epithets, derogatory comments, jokes or slurs;
2. Physical harassment, such as touching, assault, impeding or blocking movement;
3. Visual forms of harassment, such as displaying racial, ancestry (or any other protected basis) derogatory posters, cartoons or drawings that are offensive; and
4. Applying different employment terms and conditions for persons of a different race (or any other protected basis), such as being singled out for closer supervision.

When any form of racial, ancestry (or any other protected basis) harassment has the purpose or effect of creating an intimidating, hostile, or offensive working environment; has the purpose or effect of unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment opportunities, then the harassment is a violation of the State and Federal civil rights laws.

Finally, it is unlawful discriminatory practice to retaliate against any individual because the individual has opposed any discrimination or has filed a complaint, testified, or assisted in any proceeding regarding discrimination.

  
\_\_\_\_\_  
GLENN M. OKIMOTO, Ph.D.  
Director of Transportation

OCT 04 2011  
\_\_\_\_\_  
Date



**STATE OF HAWAII**  
**DEPARTMENT OF TRANSPORTATION**  
869 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

Deputy Directors  
JADE T. BUTAY  
FORD N. FUCHIGAMI  
RANDY GRUNE  
JADINE URASAKI

IN REPLY REFER TO:  
OCR 1.7252

## **SEXUAL HARASSMENT POLICY**

I want to impress upon each employee that the Department of Transportation has a strong policy against sexual harassment. All employees are entitled to a work environment free from sexual harassment and intimidation.

Sexual harassment is any unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of sexual nature where:

submission to such conduct is made either explicitly or implicitly a term or condition of employment;

submission to or rejection of such conduct is used as a basis for employment decisions;

such conduct reasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive working environment.

Sexual harassment refers to behavior that is not welcome, that is personally offensive, that fails to respect the rights of others, that lowers morale and that, therefore, interferes with our work effectiveness. Sexual harassment by any employee will not be tolerated. Appropriate disciplinary action, up to including termination, will be taken against any employee found to have violated this policy.

An employee who encounters any sexually offensive behavior or working condition, which may be considered sexual harassment, is urged to report the situation. A prompt and thorough investigation will be conducted and appropriate corrective action taken. There will be no retaliatory action taken against any employee who files a complaint or against any employee who participates in any way in an investigation.

All employees are expected to comply with this policy and take appropriate measures to ensure that improper conduct defined in this policy does not occur.

A handwritten signature in black ink, appearing to read "Glenn M. Okimoto".

\_\_\_\_\_  
GLENN M. OKIMOTO, Ph.D.  
Director of Transportation

OCT 04 2011  
\_\_\_\_\_  
Date

## **RESPONSIBILITIES FOR IMPLEMENTING THE AFFIRMATIVE ACTION PLAN**

### **Director of Transportation**

The top officials in HDOT serve at the pleasure of the Governor. Neil Abercrombie took office as Hawaii's governor On December 6, 2010. The Governor is responsible for appointing the Director of the Hawaii Department of Transportation.

Under federal and state laws and regulations, the Director of Transportation has the ultimate responsibility for the administration of HDOT's Equal Employment Opportunity program and Affirmative Action Plan. Under the AAP, the Director delegates certain responsibilities for administering and implementing the internal EEO/AA program to staff. The following are roles and responsibilities designated by the Director for implementing the program and plan.

### **Civil Rights Manager**

Rey Domingo is the Civil Rights Manager for the Office of Civil Rights (OCR). Mr. Domingo, is the Director's designee responsible for the overall development, communication, auditing, implementation, monitoring and dissemination of HDOT's policies governing Equal Employment Opportunity and Affirmative Action. The Civil Rights Manager represents the Department in matters related to review of the plan and enforcement of affirmative action by assisting and ensuring that managers are responsible and accountable for the success of the program in their areas of responsibility. The Civil Rights Manager of the Office of Civil Rights may be contacted in writing at Aliiainoku Building, 869 Punchbowl Street, Honolulu, HI 96813 or by phone at (808) 587-2020.

### **Equal Employment & Affirmative Action Specialist**

The Affirmative Action Specialist, Clifton N. Harty, reports to the Civil Rights Manager and is responsible for the daily operation and management of the AAP, including the design, implementation, and monitoring of the internal reporting system; advising the designee on a continuing basis regarding developments in Affirmative Action and Equal Employment Opportunity law; and investigating and resolving complaints alleging discrimination and/or harassment. The Affirmative Action Specialist will ensure that the department's policies governing Affirmative Action and Equal Employment Opportunity are available to all employees and to the general public. The Affirmative Action Specialist will inform employees during new employee orientations, training and department meetings to increase the awareness of managers and employees of the value of the Affirmative Action

Plan. The Affirmative Action Specialist of the Office of Civil Rights may be contacted in writing at Aliiimoku Building, 869 Punchbowl Street, Honolulu, HI 96813 or by phone at (808) 587-2135.

Mr. Harty's Responsibilities also include the following:

- Coordinate outreach recruitment efforts for protected class candidates;
- Monitor civil service register appointments and non-civil service register appointments;
- Investigate discrimination and harassment complaints;
- Ensure employees are not disciplined in a discriminatory manner;
- Provide career counseling and guidance for employees;
- Monitor hiring/promotions/terminations;
- Coordinate diversity initiatives/activities, including diversity training;
- Report quarterly to the Director on progress and deficiencies within each staff, division and regional office;
- Assist in the identification of problem areas;
- Assist managers and supervisors in arriving at solutions to problems; and,
- Serves as liaison between minority organizations, women's organizations and community action groups concerned with employment opportunities of minorities and women.

## **Managers and Supervisors**

All managers and supervisors are responsible for ensuring the success of the Department's Affirmative Action Plan. Responsibilities of the staff, region and division managers include but are not limited to:

- Review training, hiring, promotion, and termination patterns to monitor achievement of region/division goals and objectives and to identify problem areas;
- Ensure fair and unbiased interviewing and selection techniques;
- Provide career counseling to encourage upward mobility for all employees;
- Ensure that the Equal Employment Opportunity/Affirmative Action Policy Statement is displayed throughout the facilities and that person(s) with disabilities are ensured barrier free access to the statement;
- Provide reasonable accommodations for persons with disabilities;
- Monitor HDOT-sponsored activities to ensure equal opportunity participation for all employees;
- Foster discussions on affirmative action policies and procedures among managers and employees to ensure full implementation;
- Undertake measures designed to prevent harassment of employees;
- Attend department Workforce Diversity training;
- Resolve discrimination and sexual harassment complaints, as well as reasonable accommodation requests;



- Conduct outreach recruitment efforts for protected class candidates; and,
- Hold their subordinate managers and supervisors responsible and accountable for implementing the affirmative action plan.

## **Department Employees**

Department employees are responsible for supporting a work climate which values racial and cultural diversity and are conducive to achieving HDOT's EEO/AA program goals. Commitment to support the Commissioner's policy regarding EEO and affirmative action shall be a condition of employment or continuing employment.

# **A SURVEY OF THE LABOR MARKET AREA IN TERMS OF POPULATION MAKEUP, SKILLS, AND, AVAILABILITY FOR EMPLOYMENT**

## **Agency Workforce**

As of June 30, 2010, Hawaii Department of Transportation employed 2,142 persons in its permanent work force.

- 28% (602) were women
- 89.9% (1927) were minorities
- 79.27% (1395) were Asian or Pacific Islanders
- .18% (4) were Black
- .79% (17) were Hispanic
- 10.74% (230) were White
- 6.5% (140) were Chinese
- 17.5% (374) were Filipino
- 24.2% (518) were Hawaiian or Part Hawaiian
- 28.5% (611) were Japanese

## **Plan Methodology**

2000 Census data was used for the EEO4 availability analysis for this plan.

2000 Census data and local Hawaii census data was used for the EEO4A availability analysis for this plan.

Statewide education data was obtained from the Institute Research Office for the University of Hawaii (EEO4A) and from [www.citytowninfo.com](http://www.citytowninfo.com) (EEO4).

Training and promotion data was obtained from the State of Hawaii, Department of Transportation personnel records.

The database of employees and resultant employee count used in this plan was obtained from the State of Hawaii Department of Transportation personnel office. It included permanent and exempt employees. The majority of the data is based off of information given to the Office of Civil Rights on March 7, 2010.

Anticipated vacancy data was determined from looking at the turnover rate from March 2009 to March 2010.

## UTILIZATION ANALYSIS

The purpose of the Utilization Analysis is to determine whether or not affected group members are equitably represented in the workforce. The extent that affected group members are utilized is a function of comparing “What Is” (HDOT’s workforce analysis) with “What Should Be” (the external labor force and internal availability). If HDOT’s workforce is below the availability, then goals have been set to reach parity in each affected group that is underutilized.

The workforce versus availability comparison is made using percentages for both state and federal reporting purposes.

### Job Categories

The Equal Opportunity Commission (EEOC) established job categories for the purpose of analyzing an employer’s workforce. These categories are identified and defined below:

1. *Officials and Administrators*: Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, or direct individual departments or special phases of the agency’s operations, or provide specialized consultation on a region, district or area basis.
2. *Professionals*: Occupations which require specialized and theoretical knowledge which is usually acquired through college training or through work experience and other training which provides comparable knowledge.
3. *Technicians*: Occupations which require a combination of basic scientific or technical knowledge and manual skill which can be obtained through specialized post-secondary school education or through equivalent on-the-job training.
4. *Protective Service Workers*: Occupations in which workers are entrusted with public safety, security and protection from destructive forces.
5. *Paraprofessionals*: Occupations in which workers perform some of the duties of a professional or technician in a supportive role, which usually require less formal training and/or experience normally required for professional or technical status. Such position may fall within an identified pattern of staff development and promotion under a “New Careers” concept.
6. *Administrative Support*: Occupations in which workers are responsible for internal and external communication, recording and retrieval of data and/or information and other paperwork required in an office.
7. *Skilled Craft Workers*: Occupations in which workers perform jobs which require special manual skill and thorough and comprehensive knowledge

of the process involved in the work which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs.

8. *Service and Maintenance*: Occupations in which workers perform duties which result in or contribute to the comfort, convenience, hygiene or safety of the general public or which contribute to the upkeep and care of buildings, facilities or grounds of public property. Workers in this group may operate machinery.

## **Eight Factor Analysis**

Availability will be determined on an eight factor analysis using census and other data weighted based off of importance of the data. This data is then compiled to find the estimated availability of females and minorities for each job category within the recruitment area.

## **EEO-4/EEO-4A Factors**

1. Population
2. Unemployed workers
3. Civilian Labor Force
4. Requisite skills – in immediate labor area (County where job is located).
5. Requisite skills – in recruitment area (State of Hawaii).
6. Employees available for promotions
7. Persons with educational training able to be trained for the position.
8. Training provide within DOT.

*External Factors*: population, unemployment, labor force, requisite skills, and education.

*Internal Factors*: Promotions and training.

All factors were considered, except for internal training, as there is not currently enough data to provide an accurate availability using training data. Goals have been set in this plan to implement new information tracking procedures. The results are weighted statistics that are then summed by affected groups in each job group.

Calculated Availability is compared with the availability of people with requisite skills in both the immediate labor area and the recruitment area. If the Calculated Availability is less than the requisite skills in either are then the greater of the two factors will be used in lieu of the Calculated Availability.

## Job Group Narrative

Where there are less than five (5) people in a total EEO-4 or EEO-4A job category, all job titles of such people will be combined into one job group. For example, where there are only one director and four deputy directors they would be combined into one job category for the purposes of establishing goals and timetables.

Job groups will be derived from the workforce analysis and will consist of one or a group of jobs with similar content, wage rates, and opportunities as provided in the EEO-4/EEO4A Report. Job titles have been assigned and given EEO-4/EEO-4A by the State of Hawaii.

Job Groups were created by groups of jobs with similar content, wage rates and opportunities and by EEO Categories. Please see [Appendix](#) for a more detailed analysis of each job group.

### *Officials:*

1. Director and Deputy Directors
2. Airports – Airport Fire Commander, Airports Firefighting Staff Officer, Airports Construction and Maintenance Supt, Airports District Managers, Airports Operations Officer.
3. Administration – Administrative Services Officers, Business Management Officers, Civil Rights Coordinator, Departmental Personnel Officers, Fiscal Management Officer, Executive Director OMPO, Visitor Information Program Manager.
4. Highways – Engineering Program Manager, Highways Administrator, Motor Vehicle Safety Administrator, Planning Program Administrators, Right-of-way Manager.
5. Harbors – Harbor District Managers, Harbors Administrator.

### *Professionals:*

1. Accountants
2. Airport Operations Duty Managers
3. Assistant Airport Superintendents.
4. Auditors
5. Civil Rights Specialists and Equal Employment Coordinator
6. Entry Level Engineers
7. Mid-Level Engineers
8. Upper Level Engineers
9. Environmental Health Specialists
10. Highway Safety Managers and Specialists.
11. Information Specialists and Information Technology Specialists.
12. Personnel Management Specialists.

13. Planners, OMPO Planner, Transportation Planner.
14. Program Budget Analysts, Program Evaluation Analysis Managers, Program Evaluation Analysts, and Management Analysts.
15. Property Managers
16. Research Statisticians
17. Right of Way Agents
18. Visitor Information Specialists
19. General Professionals: Architects, Chemists, Horticulturists, Hazardous Materials Specialists, and Landscape Architects, Departmental Contracts Specialists, Fiscal Officers, Procurement and Supply Specialists, General Aviation Officers, Harbors Operation Supervisors.

*Technicians:*

1. Engineering Laboratory Technicians and Engineering Technicians.
2. General Construction Inspectors, Highway Construction Inspectors.
3. Land Boundary Surveyors and Land Surveyors.
4. Motor Carrier Safety Officers
5. Building Construction Inspectors.
6. Mid-Level Drafting Technicians.
7. Upper Level Drafting Technicians.
8. General Technicians – Illustrator/Photographer, Motorized Equipment Superintendent/Safety Coordinator, Computer Operations Supervisors, Computer Operators, Electronic Traffic Signal Technicians.

*Protective Services:*

1. Airport Fire Captains
2. Airport Fire Commanders
3. Airport Fire Equipment Operators
4. Airport Fire Lieutenants
5. Airport Firefighters.
6. Harbor Enforcements Officers and Security Officers.

*Para-Professionals:*

1. Drafting Aids and Engineering Aids.

*Administrative Support:*

1. Abstractors
2. Account Clerks
3. Airport Information Operators and Airport Information Unit Supervisor.
4. Business Services Supervisors.
5. Cashier Clerks and Clerk Stenographers.
6. Contracts Assistants and CIP Assistants.

7. Entry Level Office Assistants: Office Assistants II and III.
8. Upper Level Office Assistants: Office Assistant IV and Office Services Supervisor.
9. Entry Level Personnel Clerks: Personnel Clerk III
10. Upper Level Personnel Clerks: Personnel Clerk IV, V
11. Pre-Audit Clerks.
12. Private Secretaries.
13. Purchasing Technicians.
14. Entry Level Secretaries - Secretaries I and II.
15. Upper Level Secretaries - Secretaries III and IV, OMPO Secretary-Office Coordinator.
16. Tunnel Systems Operators.
17. General Admin Support: Data Entry Operators, Data Processing Control Clerk, Office Services Supervisor, OMPO Fiscal Assistant, Personnel Technicians, Storekeepers.

*Skilled Crafts:*

1. Mechanics: Air Conditioning Mechanics, Automotive Mechanics, Airport Maintenance Repairers, Maintenance Mechanics, Parking Meter Mechanics, Crash/Fire Equipment Mechanics, Heavy Vehicle and Construction Equipment Mechanics.
2. Technicians: Automated Systems Equipment Technicians and Automotive Technicians.
3. Supervisors: Building Construction and Maintenance Supervisors, Bridge Maintenance Supervisors, Building Construction Maintenance Supervisors, Building Maintenance Supervisors, Construction and Maintenance Supervisors, General Construction and Maintenance Supervisors, Maintenance and Repair Supervisors, Wharf Maintenance Supervisors, Automotive Mechanics Supervisors, Air Conditioning Mechanics Supervisor, Airport Maintenance and Repair Supervisor, Maintenance Repair Supervisors, Highways Construction and Maintenance Supervisors. Traffic Signs and Marking Supervisors, and Traffic Signal and Highway Lighting Supervisor.
4. Workers: Bridge Maintenance Workers, Wharf Maintenance Workers, Building Maintenance Workers, Highway Lighting Workers
5. Carpenters: Carpenters and Carpenter Supervisors.
6. Electricians: Electricians and Electrician Supervisors.
7. Heavy Equipment Operators.
8. Painters: Painters, Sign Painters, and Painter Supervisors.
9. Plumbers: Plumbers and Plumbers Supervisors.
10. Street Sweepers: Street Sweeper Operators.
11. General Skilled Crafts Workers – Masons, Offset Press Operators, and Welders.

*Service and Maintenance:*

1. Airport Baggage Attendants
2. Airport Operations Controllers and Airports Operations Control Unit Supervisors.
3. Airports Operations and Maintenance Workers.
4. Helpers: Automotive Mechanic Helpers and Automotive Service Utility Workers. Building Maintenance Helpers. Electrician Helpers, Mason Helpers, Painter Helpers, Plumber Helpers, Sign Painter Helpers, and Sprinkler System Repairer, Storeroom Helpers.
5. Carpet Cleaners: Carpet Cleaners and Carpet Cleaner Supervisors.
6. Equipment Operators
7. General Laborers
8. Groundskeepers and Power Mower Operators.
9. Harbor Agents and Harbor Traffic Controllers
10. Heavy Truck Drivers
11. Highway District Maintenance Supervisors and Highways Special Services Supervisors.
12. Janitors – Janitor II, III, and Refuse Collectors.
13. Janitor Supervisors
14. Light Truck Drivers
15. Marine Cargo Specialists.
16. Tractor Semi-Trailer Operators and Tractor Operators.
17. Truck Drivers, and Truck Driver Laborers
18. Visitor Information Program Assistants.
19. General Maintenance Workers: Traffic Striping Machine Operators, Nursery Workers, Warehouse Workers, Water Service Workers.



## COMPLAINT PROCEDURES

### Department of Transportation Internal Complaints

#### *Informal*

The Office of Civil Rights takes all complaints about discrimination seriously and will vigorously investigate any allegations. Formal written complaints are not necessary and employees are encouraged to call Clifton Harty, the EEO/AA Specialist with any complaints of discrimination.

OCR maintains an open door policy and believes that it is important to put a quick stop to any discriminatory activity before it becomes a serious issue. Many situations can be resolved informally with the help of the EE/AA Specialist, between the employees, or with the help of management.

If an employee has a complaint of possible discrimination they should contact the Clifton N. Harty, at the Office of Civil Rights at:

- Phone: 808-587-2135
  - Phone: 808-587-2135
  - Facsimile: 808-587-2025
  - E-mail: [clifton.harty@hawaii.gov](mailto:clifton.harty@hawaii.gov).

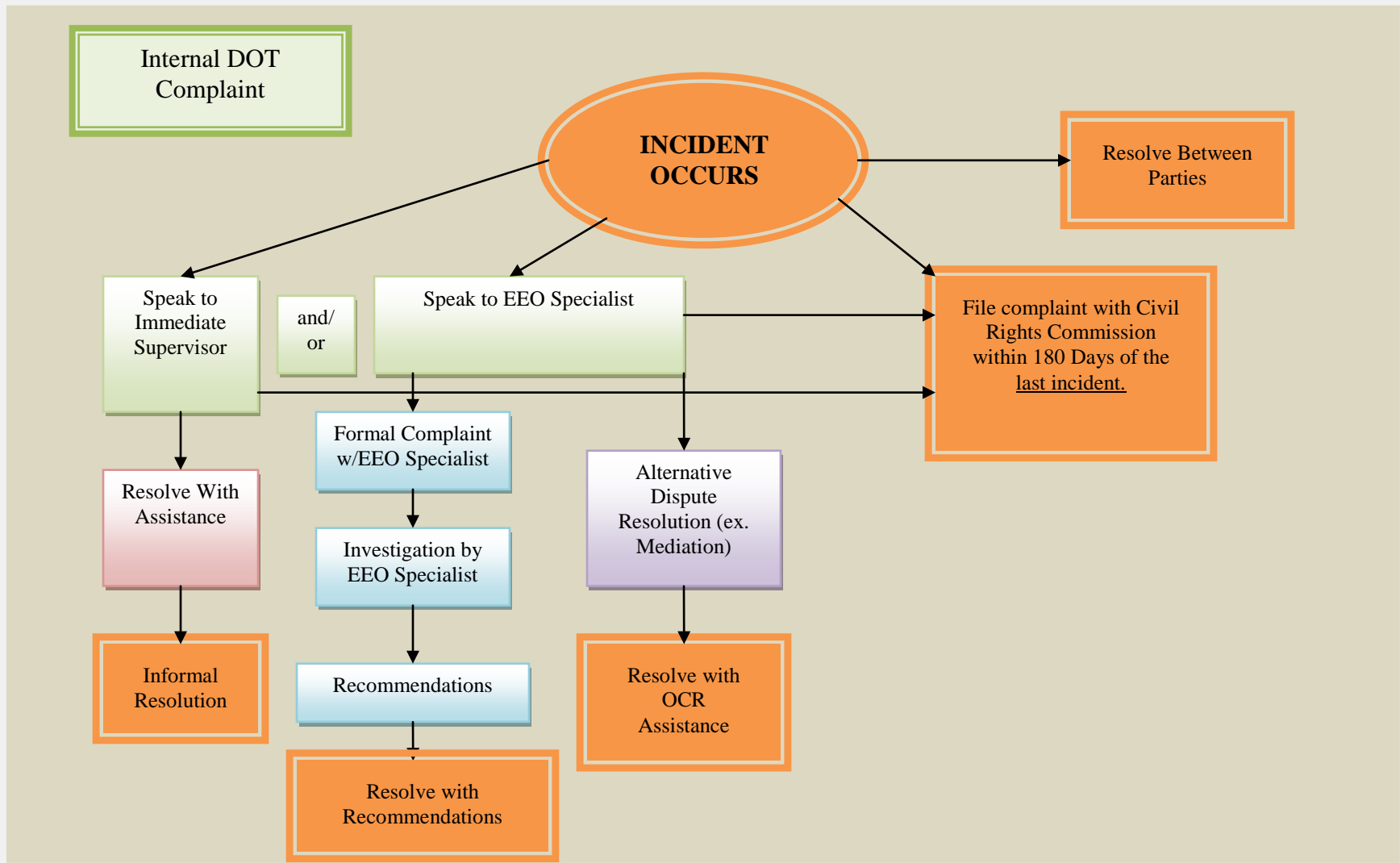
#### *Formal*

1. Contents of Complaint: A formal complaint must be filed in writing to the Office of Civil Rights and shall contain the following:
  - a. Complainant's full name, mailing address and phone number;
  - b. Identity of the person(s) complainant is filing against;
  - c. Description of the complainant's allegations. The description should be sufficiently detailed, to allow for the determination of the following: jurisdiction, timeliness and merits of the complaint; and
  - d. Signature of the complainant or his/her authorized representative on the written complaint.
2. Representation: has the right to legal counsel.
3. Complaint Processing: OCR will:
  - a. Contact the complainant within ten (10) working days of receipt of the complaint to hear and try to resolve the issues in the complaint.
  - b. Offer the option of mediation of the dispute
  - c. Advise the complainant of options available to redress the issues.
  - d. If appropriate, assist complainant in filling out an Employee Incident Report.
  - e. Investigate the complaint.
  - f. Attempt informal resolution with complainant and management.

- g. Provide a written decision on the issues presented and reasons for acceptance or rejection by the division administrator or director.
- h. Inform the complainant of the Director's decision in writing within ninety (90) days after conclusion of the investigation.
- i. Advise the complainant of other avenues of redress such as filing with the Hawaii Civil Rights Commission or the Equal Employment Opportunity Commission.

### *Mediation*

1. All complainants will have the option of requesting mediation of their complaint.
2. The EEO/AA Specialist will evaluate the case and determine whether assignment of the case to the Mediation Center of Hawaii or another mediation organization is appropriate.
3. All mediation records are confidential and will not be disclosed to anyone.



## **Hawaii Civil Rights Commission (HCRC)**

Any individual claiming to be aggrieved by an alleged unlawful discriminatory practice may file with the HCRC's executive director a complaint in writing that shall state the name and address of the person or party alleged to have committed the unlawful discriminatory practice complained of, set forth the particulars thereof, and contain other information as may be required by the commission.

The complaint must be filed within one hundred eighty (180) days after the alleged unlawful discriminatory practice occurred.

The Hawaii Civil Rights Commission can be contacted at:

Hawaii Civil Rights Commission  
380 Punchbowl Street, Rm. 411  
Honolulu, HI 96813  
Phone (808) 586-8636

## **Equal Employment Opportunity Commission (EEOC)**

Charges must be filed with EEOC within 180 days of the alleged discriminatory act. However, in states or localities where there is an antidiscrimination law and an agency authorized to grant or seek relief, a charge must be presented to that state or local agency. Furthermore, in such jurisdictions, you may file charges with EEOC within 300 days of the discriminatory act, or 30 days after receiving notice that the state or local agency has terminated its processing of the charge, whichever is earlier.

The Equal Employment Opportunity Commission can be contacted at:

Equal Employment Opportunity Commission  
300 Ala Moana Blvd., Rm. 7123A  
Honolulu, HI 96813  
Phone: (808) 541-3120

## **PUBLICATION OF AFFIRMATIVE ACTION PLAN**

### **Internal Publication:**

The HDOT will ensure that the AAP is available to all employees and that all employees are fully informed of their rights. The plan will be posted in conspicuous work areas of HDOT, will be available in each work unit, will be accessible to all employees upon request, will be posted on the Office of Civil Rights webpage, will be made available in electronic format in the department's electronic library, will be made available via hard copy in all divisional personnel offices, and will be made available to employees via hardcopy upon request.

The Civil Rights Policy issued by the Director will be posted on bulletin boards in conspicuous locations throughout HDOT worksites, will be published in HDOT magazines and/or newsletters and will be distributed to employees during employee orientation and training.

### **External Publication:**

A copy of the Affirmative Action Plan will be made available to the public upon request. HDOT will initiate and undertake aggressive, relationship-building activities to ensure frequent contact with protected group members, community organizations, and resource agencies. The Equal Employment Opportunity/Affirmative Action policies will be publicized externally by incorporating an equal opportunity statement in all purchase orders, contracts, and recruitment advertising. With the exception of a bona fide occupation qualification (BFOQ), notices of recruitment advertisement will not contain reference to race, color, sex, gender, religion, creed, age, marital status, gender identification, national origin, ancestry, sexual orientation, disabled and Vietnam-era veteran's status, arrest or court record, or physical, sensory, mental disability, political affiliation, or national guard participation, or any other protected category.

The HDOT will not knowingly conduct business with any entity that discriminates against protected group members and/or violates Federal or State civil rights laws. An equitable representation of protected group and non-affected group employees will be shown in HDOT brochures, publications, manuals, reports, and advertisements that depict the HDOT workforce.

HDOT will distribute letters that encourage applicant referrals to the following organizations:

- Minority groups
- Female groups
- Community action groups
- State employment agencies
- Professional organizations
- Recruitment agencies
- Colleges

## **HDOT PROGRAMS TO ELIMINATE DISCRIMINATORY BARRIERS AND ACHIEVE HDOT GOALS**

### **Job Structuring and Upward Mobility:**

Job Description: An inaccurate job description can have an enormous impact on minority and female applicants. In order to ensure that there is no disparate impact within HDOT, the EEO/AA Specialist will periodically review classification plans to ensure that positions are allocated the appropriate classification. The EEO/AA Specialist will review all job descriptions before the position is posted.

The EEO/AA Specialist will also work to provide that:

- All qualification requirements are closely job related;
- Jobs are restructured to establish entry level and trainee positions to facilitate progression within occupational areas;
- Career counseling and career guidance are available to employees.
- Career development plans are created for lower grade employees who are underutilized or who demonstrate potential for advancement;
- There is wide publication of upward mobility programs and opportunities within each work unit and within the total organizational structure.

### **Recruitment, Placement, Hiring:**

In order to ensure fair and equal treatment of all races and genders it is necessary that all programs for the filling of HDOT positions be done in a fair and nondiscriminatory manner. To achieve this goal the EEO/AA Specialist will work closely with the Department of Human Resource Development ('DHRD'), HDOT Personnel offices, minority and female community organizations, and other organizations. In addition HDOT will ensure that all hiring announcements and literature promote an environment of inclusion to all applicants.

To implement these goals the EEO/AA Officer will review and monitor HDOT recruitment and placement procedures to ensure that no discriminatory practice exists. The EEO/AA Officer will also work closely with management and HDOT personnel officers to review and validate any written tests and selection devices to ensure that they comply with EEO/AA laws and regulations. A thorough analysis of the applicant flow, selection, rejection, and appointment process will be done on a continual basis. After hiring the EEO/AA Officer will ensure that the assignment of work is done in a nondiscriminatory basis.

## Promotions:

All interagency promotions should be done in a fair and nondiscriminatory manner and should provide for equal opportunity for all persons based on merit and without regard to race, color, religion, sex or national origin. The EEO/AA Officer will work with the Director of HDOT to establish an agency-wide merit promotion program. The Merit Promotion Program will include the placement, promotion, transfer, reassignment and other movement of competitive service employees.

The underlying principle of Merit Promotion Programs will be the identification, qualification evaluation, and selection of candidates which will be made without regard to political, religious, labor organization affiliation, marital status, race, color, sex, national origin, non-disqualifying physical or mental handicap, or age and shall be based solely on job-related criteria in accordance with legitimate position requirements.

*The EEO/AA Specialist will:*

- Oversee and review the effectiveness of the Merit Promotion Program.
- Establish a Skills bank to match employee's skills with available job advancement opportunities.
- Evaluate promotion criteria and eliminate factors which may lead to non selection of employees or applicants, in particular minorities and females.
- Require a written justification from selecting officials when a well qualified person is not selected for upgrading or promotion.
- Review all job postings and encourage all employees to apply for jobs which the employee believes they are qualified; and
- Publicize the program by highlighting advancement of minorities and females to key jobs by periodic e-mail newsletters.
- Encourage employees to improve their performance to develop their knowledge, skills, and abilities
- Ensure the maximum utilization of employees in positions for which they are best qualified

## Training:

Proper implementation of an effective EEO policy requires a detailed training program for employees, supervisors, and management. The EEO/AA Specialist will:

- Provide EEO seminars covering the AAP, the overall EEO program and the administration of the policies and procedures therein, and on Federal, State, and local laws relating to the EEO;



- Provide regular training in proper interviewing techniques to employees that are selected to sit on an interview selection committee;
- Provide regular training to employees on nondiscrimination in the workplace.
- Provide regular training and educational programs to employees designed to provide opportunities for employees to advance in relation to the present and projected manpower needs of the agency and the employees' career goals;
- Ensure that all training programs are provided on an equal basis to all eligible HDOT employees.

### **Layoffs, Recalls, Discharges, Demotions, Disciplinary Actions:**

Discrimination does not always occur through purposeful action. Many times the discrimination is the unintentional byproduct of a faulty system. In order to ensure that there is no disparate effect on minority or gender groups the EEO/AA Specialist will ensure that all practices, even seeming neutral practices, are reexamined to look for possible disparate effect on minority and females.

*The EEO/AA Specialist will:*

- Ensure that the standards for deciding when a person is terminated, demoted, disciplined, laid off or recalled is the same for all employees, including minorities and females;
- Review all decisions to discipline, lay off, discharge, or downgrade before they become final;
- Ensure that no punitive action is taken against an employee filing a discrimination complaint and educate supervisors and managers that retaliation against employees for filing a complaint is illegal.
- Conduct exit interviews with all employees who leave the employment of DOT.

*The Personnel Office will keep the following records to monitor EEO programs:*

- On all terminations, including layoffs and discharges, indicate total number, name, employment date, termination date, recall rights, sex, racial/ethnic identification (by job category), and reason for employment action.
- On all demotions: indicate total number, name, demotion date, sex, racial/ethnic identification (by job category), and reason for demotion.
- On all recalls: indicate total number, name, recall date, sex, and racial/ethnic identification (by job category).
-

## **Additional Personnel Actions:**

The EEO/AA Specialist will also:

- Assure that information on EEO counseling and grievance procedures is easily available to all employees;
- Inform employees that they have the right for a complaint alleging discrimination of race, color, religion, sex or national origin to be heard before an impartial body.
- Create a unified system for processing grievances and appeals (i.e. disciplinary actions, adverse actions, adverse action appeals, etc.).
- Create a system to rate the performance of managers and supervisors in their performance of the EEO program responsibilities assigned to them.
- Review and monitor the performance appraisal program periodically to determine its objectivity and effectiveness; and
- Ensure the equal availability of employee benefits to all employees.

## MAINTAINING CONTACTS WITH ORGANIZATIONS REPRESENTING MINORITY GROUPS, FEMALE AND PROFESSIONAL SOCIETIES.

### Community Action Programs

The following officials named below are responsible for the following community action programs:

Senior Community Service Employment Program	Parks and Recreation 973-7258
Office of Community Services Department of Labor and Industrial Relations	<b>Mila Kaahanui</b> Executive Director 808-586-8680
Job Accommodation Network U.S. Department of Labor	(800)526-7234
Hawaii One-Stop Career Centers	
Oahu	(808)586-8700
Hawaii	(808)981-2160
Maui	(808)984-2091
Molokai	(808)553-1755
Kauai	(808)274-3056
HireNet Hawaii	<a href="http://www.hirenethawaii.com">www.hirenethawaii.com</a>

## Minority and Female Recruiting Sources

<b>COLLEGES/UNIVERSITIES</b>	
University of Hawaii Manoa	University of Hawaii Hilo
Hawaii Pacific University	University of Hawaii Community Colleges
Center for Korean Studies – University of Hawaii at Manoa	Brigham Young University – Hawaii
Hawaii Pacific University	Chaminade University
<b>ORGANIZATION</b>	
Society of Women Engineers	International Association of Women in Fire & Emergency Services
National Society of Black Engineers	Society of Hispanic Professional Engineers
National Association of Hispanic Firefighters	International Association of Black Professional Firefighters
Counsel for Native Hawaiian Advancement	Office of Hawaiian Affairs
Japan-American Society of Hawaii	Kamehameha Schools
Filipino American League of Engineers and Architects	The Filipino Community Center
Associated Chinese University Women	The United Chinese Society of Hawaii
African American Diversity Cultural Center of Hawaii	Ke Ali'i Pauahi Foundation
The Native Hawaiian Leadership Project	The Institute for Native Pacific Education and Culture
Hawaii Firefighters Association	The Hispanic Center of Hawaii
The Hawaii Korean Chamber of Commerce	Chinese Women's Club of Hawaii
National Organization of Gay and Lesbian Scientists and Technical Professionals	

## APPLICATIONS OF FOUR-FIFTHS RULE

The uniform Guidelines on Employee Selection Procedure and Federal Government Agency Guidelines embody the concept that selection procedures resulting in adverse impact upon racial/ethnic or gender groups are discriminatory unless proven otherwise. There is evidence of adverse impact when any racial/ethnic or gender group has a selection rate of less than 80% of the group with the highest selection rate.

Selection procedures are those that lead to employment decisions in such areas as recruitment, hiring, promotions, demotions, retention, transfers, details, dismissals, layoffs, pay adjustments, awards, training, and performance appraisals. Whenever adverse impacts are found three options for action by the HDOT are available.

1. Change the procedure
2. Use a different procedure
3. Validate the procedure

HDOT will count and record applicants and selections by the racial/ethnic origin groups and gender. Records will be maintained on an annual basis on the number of persons hired, promoted, demotions, disciplinary actions, training, lay off, terminated, etc., for each job.

Annual adverse impact determinations will be prepared for each group comprising 2% or more of the relevant labor force or applicable workforce. For example, adverse impact determinations must be made for new hires and each group which constitutes 2% or more of the applicants. For promotions adverse impact determinations will be made for each group which constitutes 2% or more of the HDOT's workforce. The same principle will be applied to adverse impact determinations on terminations.

Whenever adverse impact is found, the HDOT will examine the selection procedure to determine what is causing it. At that point the three options will be considered and exercised as appropriate.

Adverse impact is determined by dividing the number of employees retained by the number employed before the terminations occurred. Once the highest retention rate is identified the other groups' ratio to it is determined by dividing their selection rates by the highest rate.

## PROGRAM COMMITMENTS AND GOALS

*Quarterly Report:* The EEO/AA Specialist will develop a monitoring and reporting system. The system will be designed to achieve the goals of the AAP. The EEO/AA Specialist will submit a report to the Director each quarter on July 1<sup>st</sup>, October 1<sup>st</sup>, January 1<sup>st</sup>, and April 1<sup>st</sup>. The report will include an up to date workforce profile, analysis of the HDOT's progress towards achieving AAP goals, and it will identify areas of concern and recommend corrective action. When a problem area is identified the HDOT will take the appropriate steps to remedy the problem.

*Annual AAP Update:* The EEO/AA Specialist will prepare an annual update of the AAP that will be submitted to all appropriate federal agencies for approval. It will include the efforts made during the previous reporting cycle to implement recommendations, progress towards achieving the listed AAP goals, progress towards correcting problem areas, and a general overview of HDOT's Equal Employment Opportunity programs. Supervisors and managers will assist in establishing specific numerical goals and objective where appropriate.

*Diversity Training:* Diversity training by the HDOT Office of Civil Rights (OCR) is mandatory for all HDOT employees. In the training HDOT employees will be provided information on the Department's policies and programs. OCR Diversity Training includes three modules: *Valuing Diversity*, *Harassment/Discrimination Prevention*, and *Disability Awareness*. In addition new employees are made aware of policies in new employee packets and new employee orientations.

*Management Training:* Separate mandatory training will be provided to managers and supervisors. OCR management training will include three modules: (1) *Accountability for Management of Departmental Equal Employment Programs*, (2) *Enforcement, Oversight, and Responsibilities of Managers in Preventing Harassment and Discrimination* and (3) *Proper Reporting of Discrimination Complaints to OCR*.

*Civil Rights Complaints and Investigations:* OCR conducts fair and impartial investigations and seeks to resolve issues through informal processes, including mediation. Employees may file a complaint with the HDOT Office of Civil Rights if they believe they have been subjected to discrimination or harassment on the basis of their race, color, sex, gender, national origin, ancestry, age, religion, disability, marital status, veteran's status, pregnancy, women breast feeding, sexual preference, gender identification, arrest or court records, national guard participation or genetic information. Managers can request OCR informal or formal inquiries and mediation services to prevent and correct discrimination or harassment.

*Management Performance Evaluations:* Clear expectations and accountability of managers, supervisors, and employees is critical to the success of the AAP. A

factor to rate manager's and supervisors' performance in discharging EEO program responsibilities will be incorporated into the employee performance evaluation system.

*Application Flow Data Collection and Analysis:* OCR has provided an Applicant Flow Database to each departmental personnel office to collect information on how recruitment and hiring practices impact affected groups, as required by FHWA, FTA and other federal agencies.

*Recruitment and Retention Outreach:* OCR will create a list of minority and female organization to distribute all HDOT external vacancy announcements. OCR will work with the departmental personnel office to ensure that external vacancies are reported to OCR prior to submission to DHRD. In addition OCR will ensure that internal vacancy announcements are properly disseminated to ensure that they reach all minority and female candidates.

*Career Development Programs:* In an effort to retain its workforce, HDOT will seek input from its employees regarding job satisfaction, desire for development and promotional opportunities, and concerns related to their work environment. OCR will encourage participation in programs to improve upward mobility and retention of minority and female employees. Participation in the following programs will be reviewed and reported on annually by OCR:

- HDOT Training Programs
- HDOT Temporary Assignment Programs
- Tuition Fee Reimbursement Program

*Exit Interviews:* A new electronic exit interview form will be created by OCR for distribution to all departmental personnel offices. The data collected will provide OCR with statistical data on why employees are leaving the agency.

*Employee Skills Database:* An electronic form will be created that will be sent to all employees. The form will gather information on education, certifications, training, and experience of employees

*Recruitment of Qualified Females:* The largest area of underutilization in HDOT with female employees. There are several factors contributing to this area of underrepresentation, including low numbers of applicants, antiquated beliefs in roles of females in the workforce, inadequate recruitment, and poorly constructed job postings. In order to increase the number of females within the department HDOT will be attending job fairs, will be educating its staff to dispel the belief that females are not interested in jobs with HDOT, and will work on revising and updating the selection process to ensure that females are encouraged to apply.

*Internal Data Collection:* OCR will implement a new data collection system for eeo/aa information. In order to collect the proper data forms have been created to ensure with all new selections and employment decisions that the proper data

is collected. Data will be collected for both EEO-4 and EEO-4A (Hawaii Specific) racial categories.

- Race Identification Form: a new race identification form has been created that includes boxes for the normal EEO categories. This form will be given to all current and future employees so that the data can be properly tracked. It is believed that just the updating of information from this form may reduce the apparent underrepresentation in some minority and ethnic groups as individuals will no longer be counted as other on the lists.
- Training: a form has been created to track the training given to employees. This tracking will include Temporary Assignments that were formerly not considered training.
- Employment Decisions: forms have been created to track hiring, firing, retirement, and all other employment actions.

*EEO Advisory Committed and Counseling Program:* OCR investigates whether it would benefit HDOT to create an EEO Advisory Committee, An EEO Employee Committed, and/or an EEO Counseling Program.